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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ALEJANDRO LECHUGA,

14 Defendant.
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Case No. 2:11-cr-00174-JCM-CWH

**STIPULATION TO DISMISS
PETITION TO REVOKE
SUPERVISED RELEASE (ECF NO.
90) AND VACATE REVOCATION
HEARING (ECF NO. 110)**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Shaheen Torgoley, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Brandon C. Jaroch, Assistant Federal Public Defender, counsel for Alejandro Lechuga,
21 that the Petition to Revoke Supervised Release (ECF No. 90), filed on September 4, 2020, be
22 dismissed and the Revocation Hearing (ECF No 110), scheduled for June 16, 2021, at 10:00
23 a.m., be vacated.

24 This Stipulation is entered into for the following reasons:

25 1. Mr. Lechuga has been on supervised release since August 18, 2016, and is set
26 to expire on August 17, 2021. The allegations contained in the Petition to Revoke Supervised

1 Release (“the petition”) are currently subject to Nevada state court proceedings set for trial on
2 August 23, 2021, in case number C-21-353977-1.

3 2. Prior to the filing of the petition, Mr. Lechuga had no violations while on
4 supervision. After the petition was filed, Mr. Lechuga was subject to two days of federal
5 custody and his release conditions were modified to include location monitoring where he was
6 ordered to wear a GPS ankle monitor for 90 days. To date, Mr. Lechuga has incurred no
7 additional violations.

8 3. Given that Mr. Lechuga was subject to some corrective measures as a result of
9 the petition, that he will be contesting state criminal charges at a trial beyond the expiration of
10 his supervised release term, and his overall conduct while on supervision over the last five
11 years, the parties agree that there is no need to continue with the petition.

12 4. U.S. Probation Officer Matthew Martinez agrees with the dismissal of the
13 petition.

14 5. Mr. Lechuga is out of custody and agrees with the dismissal of the petition.

15 6. The parties agree to the dismissal of the petition.

16 This is the first request to dismiss the petition and vacate the revocation hearing.

17 DATED this 14th day of June, 2021.

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19 RENE L. VALLADARES
20 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

21 */s/ Brandon C. Jaroch*
22 By _____
23 BRANDON C. JAROCH
Assistant Federal Public Defender

/s/ Shaheen Torgoley
By _____
SHAHEEN TORGOLEY
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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ORDER

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10 Based on the stipulation of counsel, the Court finds that good cause exists to vacate
11 the revocation hearing and dismiss the petition without prejudice.

12 IT IS THEREFORE ORDERED that the revocation hearing (ECF No. 110) scheduled
13 for June 16, 2021, at 10:00 a.m. is VACATED.

14 IT IS FURTHER ORDERED that the supervised release petition (ECF No. 90) is
15 DISMISSED without prejudice.

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17 DATED June 14, 2021.

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20 UNITED STATES DISTRICT JUDGE
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